FILED

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

2017 MAR -9 PM 3:33

CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

#1466093557

MGRD, INC.,	)	Case No.
Plaintiff,	)	1:17 MC 00014
vs.	)	
WAIORA, LLC AND WAIORA INTERNATIONAL, LTD.,	)	JUDGE NUGENT
Defendants.	)	

MOTION TO QUASH SUBPOENA ISSUED TO TODD BENNI, ESQ.

Waiora, LLC and Waiora International, Ltd. (collectively, "Waiora") and third-party Todd Benni, Esq. move the Court to enter an order under Federal Rules of Civil Procedure 26 and 45 quashing the subpoena propounded by MGRD, Inc. on March 3, 2017 (the "Subpoena") to take Mr. Benni's deposition on March 14, 2017, in Southern District of Florida case number 17-CV-60061-Bloom, captioned *MGRD, Inc. v. Waiora, LLC and Waiora International, Ltd.* As set forth in more detail the memorandum in support being filed herewith, the Court should quash the Subpoena because, as one of Wairoa's attorneys, any testimony Mr. Benni could provide is protected by the attorney-client privilege and work-product immunity and is otherwise not relevant or discoverable.

Dated: March 9, 2017

Respectfully submitted,

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Attorney for Waiora, LLC, Waiora International, Ltd. and Todd Benni, Esq.

Certificate of Service

I hereby certify that, on March 9, 2017, a copy of the foregoing is being served upon Daniel DeSouza, Esq., MGRD's counsel of record in the Florida matter, via email and by hand delivery at the following addresses:

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Attorney for Waiora, LLC and Waiora International, Ltd. and Todd Benni, Esq.